

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

WSOU INVESTMENTS, LLC D/B/A)	
BRAZOS LICENSING AND)	
DEVELOPMENT,)	
)	
Plaintiff,)	
)	C.A. No. 20-1233-CFC-JLH
v.)	
)	
XILINX, INC.,)	
)	
Defendant.)	

**PLAINTIFF WSOU INVESTMENTS, LLC D/B/A BRAZOS LICENSING
AND DEVELOPMENT’S ANSWER TO COUNTERCLAIMS**

Plaintiff and Counter-Defendant WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”) by and through its counsel of record, hereby submits its Answer in response to the allegations set forth in Defendant Xilinx, Inc.’s (“Xilinx”) Counterclaims (D.I. 39) (“Counterclaims”) as follows:

GENERAL DENIAL

Unless specifically admitted below, WSOU denies each and every allegation in the Counterclaims.

PARTIES

1. WSOU admits the allegations of paragraph 1 on information and belief.
2. WSOU states that it is a Delaware limited liability company, and admits that its principal place of business is located at 605 Austin Avenue, Suite 6,

Waco, Texas 76701. Except as expressly admitted, WSOU denies the remaining allegations of paragraph 2. Except as expressly admitted, WSOU denies the remaining allegations of paragraph 2.

JURISDICTION

3. WSOU admits that the Counterclaims purport to arise under the patent laws of the United States. Except as expressly admitted, WSOU denies the allegations of paragraph 3.

4. WSOU admits that this Court has subject matter jurisdiction over the Counterclaims. Except as expressly admitted, WSOU denies the allegations of paragraph 4.

5. WSOU states that it is subject to personal jurisdiction in this Court. Except as expressly admitted, WSOU denies the remaining allegations of paragraph 5.

6. WSOU admits that venue is proper in this District. Except as expressly admitted, WSOU denies the remaining allegations of paragraph 6.

COUNT ONE – DECLARATORY JUDGMENT OF NON-INFRINGEMENT

7. WSOU restates and incorporates by reference the foregoing paragraphs of this Answer as if fully set forth herein.

8. WSOU admits that an actual controversy exists between Xilinx and WSOU. Except as expressly admitted, WSOU denies the remaining allegations of paragraph 8.

9. WSOU denies the allegations of paragraph 9.

10. WSOU denies the allegations of paragraph 10.

11. WSOU denies the allegations of paragraph 11.

COUNT TWO – DECLARATORY JUDGMENT OF INVALIDITY

12. WSOU restates and incorporates by reference the foregoing paragraphs of this Answer as if fully set forth herein.

13. WSOU admits that an actual controversy exists between Xilinx and WSOU. Except as expressly admitted, WSOU denies the remaining allegations of paragraph 13.

14. WSOU denies the allegations of paragraph 14.

15. WSOU denies the allegations of paragraph 15.

PRAYER FOR RELIEF

WSOU hereby incorporates by reference the foregoing paragraphs of this Answer as if fully set forth herein. WSOU denies that Xilinx is entitled to the relief requested in paragraphs A-F of its Prayer for Relief and denies the allegations therein.

JURY DEMAND

WSOU demands a jury trial on all issues raised by Xilinx's Counterclaims.

Dated: July 13, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served on all parties who have appeared in this case on July 13, 2021, via the Court's CM/ECF system.

/s/ James M. Lennon
James M. Lennon (No. 4570)